

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

TIG INSURANCE COMPANY,
as successor-in-interest to
TRANSAMERICA INSURANCE COMPANY,

Petitioner,

-against-

FIRST STATE INSURANCE COMPANY,

Respondent.

CIVIL ACTION NO.
04CV12729MLW

AFFIDAVIT OF JOHN F. FINNEGAN

I, John F. Finnegan, being duly sworn, do hereby certify, depose and state as follows:

1. I am a partner in the New York law firm of Cadwalader, Wickersham & Taft LLP, 100 Maiden Lane, New York, New York 10038. I make this affidavit upon my personal knowledge and in support of my application to appear in this proceeding as an attorney *pro hac vice*.

2. I am a member in good standing of the Bars of the State of New York and the United States District Courts for the Southern and Eastern Districts of New York. I have no grievance or disciplinary proceedings pending against me, and I have never been disbarred, suspended or disciplined.

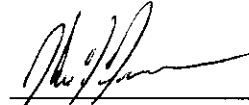
3. I am neither licensed to practice law in the Commonwealth of Massachusetts nor a resident of the Commonwealth of Massachusetts. I have familiarized myself with the Local Rules of the United States District Court for the District of Massachusetts.

4. The petitioner desires that Cadwalader represent it in this litigation due to Cadwalader's familiarity with the petitioner and the matters involved in this proceeding.

5. The law firm of Cetrulo & Capone LLP, Boston, Massachusetts, will be actively associated with Cadwalader in this litigation and will serve as co-counsel of record.

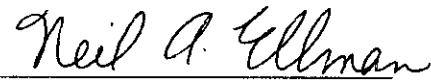
For the foregoing reasons, I respectfully request that the Court permit me to take part in this litigation and that the Motion to Admit Counsel *pro hac vice* be granted.

SIGNED UNDER THE PENALTIES OF PERJURY THIS 10th DAY OF JANUARY, 2005.


John F. Finnegan
Cadwalader, Wickersham & Taft LLP
100 Maiden Lane
New York, NY 10038
(212) 504-6000

State of New York)
)
) ss.
County of New York)

On this 10th day of January, 2005, before me personally appeared John F. Finnegan, executing the above instrument, and acknowledged said instrument to be his free and voluntary act and deed.


Neil A. Ellman
Notary Public
Commission Expires: 2/28/06

NEIL A. ELLMAN
Notary Public, State of New York
No. 41406178
Qualified in Queens County
Certificate filed in New York County
Commission Expires 2/28/06

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AFFIDAVIT OF MICHAEL K. ROBLES

I, Michael K. Robles, being duly sworn, do hereby certify, depose and state as follows:

1. I am an associate with the firm Cadwalader, Wickersham & Taft LLP, 100 Maiden Lane, New York, New York 10038. I make this affidavit upon my personal knowledge and in support of my application to appear in this proceeding as an attorney *pro hac vice*.

2. I am a member in good standing of the Bars of the State of New York and the United States District Court for the Southern District of New York. I have no grievance pending against me, and I have never been disbarred, suspended or disciplined.

3. I am neither licensed to practice law in the Commonwealth of Massachusetts nor a resident of the District of Massachusetts. I have familiarized myself with the Local Rules of the United States District Court for the District of Massachusetts.

4. The petitioner desires that Cadwalader represent it in this litigation due to Cadwalader's familiarity with the petitioner and the matters involved in this proceeding.

5. The law firm of Cetrulo & Capone LLP, Boston, Massachusetts, will be actively associated with Cadwalader in this litigation and will serve as co-counsel of record.

For the foregoing reasons, I respectfully request that the Court permit me to take part in this litigation and that the Motion to Admit Counsel *pro hac vice* be granted.

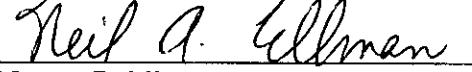
SIGNED UNDER THE PENALTIES OF PERJURY THIS 10th DAY OF JANUARY, 2005.



Michael K. Robles
Cadwalader, Wickersham & Taft LLP
100 Maiden Lane
New York, NY 10038
(212) 504-6000

State of New York)
)
) ss.
County of New York)

On this 10th day of January, 2005, before me personally appeared Michael K. Robles, executing the above instrument, and acknowledged said instrument to be his free and voluntary act and deed.



Neil A. Ellman
Notary Public
Commission Expires: 2/28/06

NEIL A. ELLMAN
Notary Public, State of New York
No. 01-456178
Qualified in Queens County
Certificate filed in New York County
Commission Expires 2/28/06